

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c) Douglas S. Stanger, Esquire Flaster/Greenberg P.C. 646 Ocean Heights Avenue Linwood, NJ 08221 DSS5141 Phone: 609-645-1881 Attorney for Chapter 7 Trustee	
IN RE: Jimmie D. Wooding, Debtor(s)	TRENTON VICINAGE Case No.: 16-28431 Judge: Hon. Jerrold N. Poslusny, Jr.

**APPLICATION FOR A CONSENT ORDER RESPECTING THE RECLASSIFICATION/
MODIFICATION OF CLAIM #2 OF SKYLINE CONDOMINIUM ASSOCIATION**

THIS MATTER coming before the Court upon the Application of Douglas S. Stanger, Esquire, of the law firm Flaster Greenberg, P.C., counsel for Chapter 7 Trustee for the Estate of Jimmie D. Wooding; the Creditor having appeared by and through its attorney, William A. Thompson, III of the law firm of Callaghan Thompson & Thompson (the "Parties") and the Parties having consented to the entry of this Order within the bankruptcy proceeding respectfully represents as follows:

1. The above-captioned Debtor filed a voluntary Chapter 7 petition under the United States Bankruptcy Code in the United States Bankruptcy Court for the District of New Jersey on September 27, 2016. Douglas S. Stanger was appointed as Trustee on September 27, 2016.
2. The 341(a) Meeting of Creditors was held on October 27, 2016.

3. On March 17, 2017, Creditor Skyline Condominium Association filed a Secured Claim under Real Estate Consensual in the amount of \$3,820.75 under Claim #2.

4. The Trustee objected to the classification of the claim as the real estate was sold by Sheriff's Sale on November 29, 2019, and can therefore no longer be classified as a secured claim.

5. The Parties have consented to amicably resolve the objection and modify/reclassify Claim #2 as unsecured.

WHEREFORE, Douglas S. Stanger, on behalf of the Chapter 7 Trustee, respectfully requests that this Honorable Court enter the proposed form of Consent Order granting the relief set forth and additional relief as may be appropriate.

FLASTER/GREENBERG, P.C.



/s/Douglas S. Stanger
Douglas S. Stanger, Esq.

Dated: October 3, 2019